

Hearing Date: December 2, 2010 at 9:45 am (ET)  
Objection Deadline: November 25, 2010 at 4:00 pm (ET)

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Attorneys for *Movant*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

MOTORS LIQUIDATION COMPANY,  
f/k/a GENERAL MOTORS CORPORATION, et al.

Debtors.

Chapter 11

Case No. 09-50026 (REG)

Jointly Administered

**NOTICE OF MOTION FOR AN ORDER PURSUANT TO 11 U.S.C. § 362(d)  
GRANTING RELIEF FROM AUTOMATIC STAY AND AUTHORIZING  
MOVANT TO PROCEED WITH PENDING ACTION**

**PLEASE TAKE NOTICE** that on November 2, 2010, counsel for Samuel Barrow (“Movant”), filed a motion (the “Motion”) pursuant to section 362(d) of the United States Code (the “Bankruptcy Code”) for an order modifying the automatic stay to allow him to proceed with his wrongful discharge and retaliation action pending in the United States District Court for the Southern District of Ohio.

**PLEASE TAKE FURTHER NOTICE** that a hearing will be held before the Honorable Robert E. Gerber, United States Bankruptcy Judge, in Courtroom 621 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on December 2, 2010 at 9:45 a.m., or as soon thereafter as counsel can be heard, to consider the Motion.

**PLEASE TAKE FURTHER NOTICE** that responses or objections, if any, to the Motion must be in writing, must conform to the Federal Rules of Bankruptcy Procedure and Local Rules of the Bankruptcy Court and must be filed with the Bankruptcy Court electronically by registered users of the Bankruptcy Court’s case filing system (the User’s Manual for the Electronic Case Filing System can be found at <http://www.nysb.uscourts.gov>, the official website

for the Bankruptcy Court) and, by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect or any other Windows-based word processing format, in either case, with two hard copies delivered directly to the Chambers of the Honorable Robert E. Gerber, U.S.B.J., United States Bankruptcy Court, One Bowling Green, Courtroom 621, New York, New York 10004; and shall be served upon: (i) Weil, Gotshal & Manges LLP, attorneys for the Debtors, 767 Fifth Avenue, New York, New York 10153 (Attn: Harvey R. Miller, Esq., Stephen Karotkin, Esq., and Joseph H. Smolinsky, Esq.); (ii) the Debtors, c/o Motors Liquidation Company, 500 Renaissance Center, Suite 1400, Detroit, Michigan 48243 (Attn: Ted Stenger); (iii) General Motors, LLC, 400 Renaissance Center, Detroit, Michigan 48265 (Attn: Lawrence S. Buonomo, Esq.); (iv) Cadwalader, Wickersham & Taft LLP, attorneys for the United States Department of the Treasury, One World Financial Center, New York, New York 10281 (Attn: John J. Rapisardi, Esq.); (v) the United States Department of the Treasury, 1500 Pennsylvania Avenue NW, Room 2313, Washington, D.C. 20220 (Attn: Joseph Samarias, Esq.); (vi) Vedder Price, P.C., attorneys for Export Development Canada, 1633 Broadway, 47<sup>th</sup> Floor, New York, New York 10019 (Attn: Michael J. Edelman, Esq. and Michael L. Schein, Esq.); (vii) Kramer Levin Naftalis & Frankel LLP, attorneys for the statutory committee of unsecured creditors (the "Creditors' Committee"), 1177 Avenue of the Americas, New York, New York 10036 (Attn: Thomas Moers Mayer, Esq., Robert Schmidt, Esq., Lauren Macksoud, Esq., and Jennifer Sharret, Esq.); (viii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21<sup>st</sup> Floor, New York, New York 10004 (Attn: Tracy Hope Davis, Esq.); (ix) the U.S. Attorney's Office, S.D.N.Y., 86 Chambers Street, Third Floor, New York, New York 10007 (Attn: David S. Jones, Esq. and Natalie Kuehler, Esq.); (x) Coolidge Wall Co., L.P.A., 33 West First Street – Suite 600, Dayton, Ohio 45402, attorneys for Harco Industries, Inc. and Manpower of Dayton, Inc., Attn: C. Mark Kingseed (xi) Wilson Elser Moskowitz Edelman & Dicker, LLP, counsel to Samuel Barrow, 3 Gannett Drive, White Plains, New York 10604-3407 (Attn: David L. Tillem, Esq. and Paul Myung Han Kim, Esq.) so as to be received no later than November 25, 2010 at 4:00 p.m. (prevailing Eastern Time) (the "Objection Deadline").

**PLEASE TAKE FURTHER NOTICE** that if no objections to the Motion are timely filed, served and received in accordance with this Notice, the Bankruptcy Court may grant the relief requested in the Motion without further notice or hearing.

Dated: White Plains, New York  
November 2, 2010

**WILSON, ELSER, MOSKOWITZ,  
EDELMAN & DICKER LLP**  
*Attorneys for Movant*

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